

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

Conditional Major draft permit No. F-05-007

ESCO Corporation

3792 Lakepark Drive, Covington, Kentucky

March 16, 2005

REVIEWER: Sajjad Quabili

Plant I.D. 21-117-00150

A. I. #: 2457

Activity #: 20010001

SOURCE DESCRIPTION:

ESCO Corporation operates a metal parts manufacturing plant for construction equipment in Covington. The source applied to the Division for the renewal of their Conditional Major permit.

PERMITTING BACKGROUND:

Currently, ESCO is holding a Conditional Major permit. Plant-wide allowable VOC emissions limit is less than or equal to 20 tons per year. Plant-wide allowable single HAP emissions limit is 10 tons per year and combined HAP emissions limit is 13 tons per year.

COMMENTS:

Plant-wide VOC and combined HAP emissions limits will remain unchanged in the renewed permit.

APPLICABLE REGULATIONS:

ESCO Corporation is subject to the following regulations for their steel bucket manufacturing operations:

1. 401 KAR 59:010, New process Operations, applicable to each affected facility or source, associated with a process operation, which is not subject to another emission standard with respect to particulate, commenced on or after July 2, 1975.
2. 401 KAR 63:020; Potentially hazardous matter or toxic substances, applicable to each affected facility (s) which emits or may emit potentially hazardous matter or toxic substances.

PRECLUDE REGULATIONS:

401 KAR 59:225, New miscellaneous metal parts and products surface coating operations, ESCO has taken VOC emissions limit less than or equal to 20 tons per year to preclude the applicability of this regulation.

PERIODIC MONITORING:

The Division is requiring ESCO to keep daily records of usage of paints, solvents and thinners at each of the spraying booth and to summarize those records at the end of each month. The source shall also keep records of the monthly and twelve months rolling total for VOC and HAP emissions at the plant.

MODELING:

The Division has performed Screen 3 modeling analysis for potential to emit toxic materials. Maximum annual concentrations of all concerned toxic substances were found less than the PRG numbers.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or record keeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.